

David M. Berger (SBN 277526)

GIBBS LAW GROUP LLP

1111 Broadway, Suite 2100

Oakland, California 94607

Telephone: (510) 350-9713

Facsimile: (510) 350-9701

dmb@classlawgroup.com

Norman E. Siegel (*pro hac vice*)

J. Austin Moore (*pro hac vice*)

Kasey Youngentob (*pro hac vice*)

STUEVE SIEGEL HANSON LLP

460 Nichols Road, Suite 200

Kansas City, Missouri 64112

(816) 714-7100 (tel.)

siegel@stuevesiegel.com

moore@stuevesiegel.com

youngentob@stuevesiegel.com

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ABBY LINEBERRY and MIGUEL CORDERO,
individually and on behalf of all others similarly
situated,

Plaintiffs,

vs.

ADDSHOPPERS, INC., and PEET'S COFFEE,
INC.,

Defendants.

Case No. 3:23-cv-01996-VC

**PLAINTIFFS' RESPONSE TO ORDER ON
PROPOSED VERDICT FORM FOR CLASS
TRIAL**

Judge: Hon. Vince Chhabria

The Court ordered Plaintiffs “to file a proposed verdict form for the trial they envision as a way to assist [it] in assessing manageability.” *See* Dkt. No. 180. Plaintiffs submit their proposed verdict form as Exhibit A, which is modeled after verdict forms successfully utilized in similar statutory damages class action cases within the Ninth Circuit and the Fourth Circuit. The verdict forms for these cases are attached as Exhibit B:

1. ***Bultemeyer v. CenturyLink, Inc.***, Case No. CV-14-02530-PHX-SPL (D. Ariz.) - Motion for new trial denied, 2025 WL 671760 (D. Ariz. Mar. 3, 2025).
2. ***Montera v. Premier Nutrition Corp.***, Case No. 16-cv-06980-RS (N.D. Cal.) - Judgment affirmed by Ninth Circuit with modifications only to prejudgment interest and statutory damages amount, 111 F.4th 1018 (9th Cir. 2024).
3. ***Perez v. Rash Curtis & Associates***, Case No. 16-cv-03396-YGR (N.D. Cal.) - Motion for new trial denied, 2020 WL 1904533 (N.D. Cal. Apr. 17, 2020).
4. ***Wakefield v. Visalus, Inc.***, Case No. 3:15-cv-1857-SI (D. Oreg.) - Judgment affirmed by Ninth Circuit with modifications only to statutory damages amount, 51 F.4th 1109 (9th Cir. 2022).
5. ***Ramirez v. Trans Union, LLC***, Case No. 12-cv-00632-JSC (N.D. Cal.) - Ninth Circuit rejected request for new trial, 951 F.3d 1008 (9th Cir. 2020), *reversed on other grounds*, 594 U.S. 413 (2021).
6. ***Siqueiros v. General Motors LLC***, Case No. 16-cv-07244-EMC (N.D. Cal.) - Motion for new trial denied, 676 F.Supp.3d 776 (N.D. Cal. June 8, 2023).
7. ***Kraukauer v. Dish Network LLC***, Case No. 1:14-CV-333 (M.D.N.C.) - Judgment affirmed by Fourth Circuit, 925 F.3d 643 (4th Cir. 2019).

Dated: March 12, 2025

Respectfully submitted,

/s/ Kasey A. Youngentob

Norman E. Siegel (*pro hac vice*)

J. Austin Moore (*pro hac vice*)

Kasey Youngentob (*pro hac vice*)

STUEVE SIEGEL HANSON LLP

460 Nichols Road, Suite 200

Kansas City, Missouri 64112

(816) 714-7100 (tel.)

siegel@stuevesiegel.com

moore@stuevesiegel.com

youngentob@stuevesiegel.com

David M. Berger (SBN 277526)

GIBBS LAW GROUP LLP

1111 Broadway, Suite 2100

Oakland, California 94607

Telephone: (510) 350-9713

Facsimile: (510) 350-9701

dmb@classlawgroup.com